

March 10, 2022

VIA ECF

The Honorable Sarah J. Netburn
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, New York 10007

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In re Terrorist Attacks on Sept. 11, 2001, Case No. 1:03-md-1570-GBD-SN (S.D.N.Y.)

Dear Judge Netburn:

In accordance with this Court's Orders (ECF Nos. 7503, 7705), Al Rajhi Bank and Plaintiffs with claims against the Bank write to jointly update the Court on their meet-and-confer discussions and their proposed schedule for jurisdictional discovery.

The Parties are in agreement on a modified schedule for completion of jurisdictional fact discovery. The Parties agree as follows:

- Al Rajhi Bank shall use reasonable best efforts to substantially complete production of documents in response to Plaintiffs' requests for production consistent with the Court's Order (ECF No. 7378) on or before June 3, 2022. Documents shall be produced on a rolling basis.
- Document discovery, interrogatories, requests for admission, and fact depositions shall be completed on or before September 30, 2022.
- Document requests, depositions, interrogatories, requests for admission, and any applications to the Court with respect to the conduct of discovery must be initiated in time to be concluded by September 30, 2022.
- Absent extraordinary circumstances, no application to the Court regarding the conduct of discovery will be considered if made later than August 31, 2022.
- By August 16, 2022 (i.e., 45 days before the completion of jurisdictional fact discovery), the Parties shall submit a joint letter setting forth their joint proposal or separate proposals for expert discovery, if any.

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The Parties will continue to meet and confer on other areas of discussion, and will bring any disputes to the Court only if necessary.

Respectfully submitted,

/s/ *Nicole Erb*

Christopher M. Curran
Nicole Erb
Matthew S. Leddicotte
Reuben J. Sequeira

Counsel for Al Rajhi Bank

cc: Counsel of Record (via ECF)